

# SOWELL + DURANT

December 27, 2018

VIA SC PUBLIC SERVICE E-FILING DMS

The Honorable Jocelyn G. Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, SC 29210

RE: In re: In the Matter of: Application of Duke Energy Carolinas, LLC for  
Adjustments in Electric Rate Schedules and Tariffs and Request for an  
Accounting Order  
Docket No. 2018-319-E

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission a copy of the Petition to Intervene of Vote Solar in this case. By copy of this letter and as evidenced on the Certificate of Service, I am serving a copy of the attached by electronic mail and U.S. Mail on the parties of record.

Please feel free to contact me should you have any questions about this filing.

Sincerely,



Bess DuRant

BJD/aak

cc: Service List for Docket 2018-319-E

BESS J. DURANT

Member

sowelldurant.com

803.722.1100



a South Carolina Limited Liability Company

803-722-1102 (direct)

bdurant@sowelldurant.com

1325 Park Street, Suite 100

Columbia, SC 29201

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2018-319-E**

IN THE MATTER OF:

Application of Duke Energy Carolinas, LLC for  
Adjustments in Electric Rate Schedules  
and Tariffs and Request for an Accounting Order

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**PETITION TO INTERVENE  
OF VOTE SOLAR**

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission (“Commission”), Vote Solar hereby respectfully petitions to intervene in the above-captioned docket. Vote Solar states the following grounds in support of this petition:

1. Vote Solar is a non-profit, grassroots organization that works to foster economic opportunity, promote energy independence for consumers, and address environmental concerns by making solar generation accessible and cost-effective for all Americans. Vote Solar works to bring solar into the mainstream by engaging at the local, state, and federal levels to help remove regulatory barriers and implement policies and programs to bring solar to scale. Established in 2002, Vote Solar has over 60,000 members nationally and more than 2,400 in South Carolina, some of whom reside within the service territory of Duke Energy Carolinas, LLC (“DEC”).

2. In its regulatory work, Vote Solar is particularly focused on rate design and public policy issues related to consumer use of and access to distributed solar generation. Recognizing the importance of programs and regulatory constructs for supporting customer-sited and other forms of distributed solar, Vote Solar has actively participated in utility commission proceedings across the country involving net metering, interconnection, rate design, and resource procurement, including Arizona, California, Colorado, Florida, Georgia, Idaho, Louisiana, Massachusetts, Minnesota, Nevada, New Mexico, New York, North Carolina, Utah, Vermont,

and Wisconsin. In each of these cases, Vote Solar effectively advocated against the unreasonable imposition of barriers or rate changes that would negatively impact consumers' ability to utilize distributed solar generation to effectively manage electricity costs.

3. The name and principal business address of Petitioner:

Vote Solar  
360 22<sup>nd</sup> St., #730  
Oakland, CA 94612

4. Pursuant to Rule R.103-804(5) of the Commission's Rules of Practice and Procedure, Vote Solar is represented in this proceeding by counsel who is duly licensed to practice law in the State of South Carolina: and requests that undersigned counsel be added to the official service list:

Bess J. DuRant  
Sowell & DuRant, LLC  
1325 Park Street, Suite 100  
Columbia, SC 29201  
Phone: (803) 722-1100  
Fax: (803) 281-8890  
Email: bdurant@sowelldurant.com

5. Vote Solar consents to service via electronic mail and requests that all communications regarding this docket should be directed to Vote Solar's counsel of record and the following person:

Thadeus B. Culley  
Vote Solar, Regional Director  
1911 Ephesus Church Road  
Chapel Hill, NC 27517  
thad@votesolar.org

6. Vote Solar has a substantial interest in the subject matter of this proceeding. Vote Solar and its members support fair rate design policies that foster the growth and accessibility of distributed solar generation in South Carolina. The outcome of this proceeding could significantly impact these objectives by reducing the ability of consumers to lower their electric bills through

a drastic increase in monthly basic facilities charges, as proposed in DEC's application. Vote Solar also has an interest in grid modernization and the implications that DEC's grid investment plan will have on the ability of consumers to utilize distributed solar generation and the ability of DEC's transmission and distribution systems to facilitate and integrate additional distributed energy resources going forward.


7. As demonstrated in DEC Witness Oliver's Exhibit No. 10, Vote Solar has been an active stakeholder participating in workshops hosted by DEC and Duke Energy Progress, LLC in South Carolina on the subject of the grid improvement plan. Vote Solar has an interest in participating as a party to continue to express its positions and concerns regarding DEC's grid improvement plan in this proceeding.

8. No other party will adequately represent Vote Solar's interest in this case.

WHEREFORE, Vote Solar respectfully requests that the Commission allow it to intervene in this proceeding and to participate fully as a party in order to protect its unique and substantial interest in this case.

Respectfully submitted this 27th day of December, 2018.

SOWELL & DuRANT, LLC

By:   
 Bess J. DuRant, SC Bar No. 77920  
[bdurant@sowelldurant.com](mailto:bdurant@sowelldurant.com)  
 1325 Park Street, Suite 100  
 Columbia, South Carolina 29201  
 (803) 722-1100

*Attorneys for Vote Solar*

Columbia, South Carolina  
 December 27, 2018

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PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served the persons listed on the official service list for Docket No. 2018-319-E, listed below, a copy of the Petition to Intervene of Vote Solar via U.S. Mail and electronic mail on this day, December 27, 2018.

**PARTIES SERVED**

C. Lessie Hammonds, Esq.  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[lhammonds@regstaff.sc.gov](mailto:lhammonds@regstaff.sc.gov)

Andrew M. Bateman, Esq.  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[abatement@regstaff.sc.gov](mailto:abatement@regstaff.sc.gov)

Alexander W. Knowles, Esq.  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[aknowles@regstaff.sc.gov](mailto:aknowles@regstaff.sc.gov)

Steven W. Hamm, Esq.  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[shamm@regstaff.sc.gov](mailto:shamm@regstaff.sc.gov)

Heather Shirley Smith, Esq.  
Duke Energy Carolinas, LLC  
40 W. Broad Street, Suite 690  
Greenville, SC 29601  
[Heather.smith@duke-energy.com](mailto:Heather.smith@duke-energy.com)

Frank R. Ellerbe III, Esq.  
Robinson Gray Stepp & Laffitree, LLC  
Post Office Box 11449  
Columbia, SC 29211  
[fellerbe@robinsongray.com](mailto:fellerbe@robinsongray.com)

Stephanie U. Eaton, Esq.  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
[seaton@spilmanlaw.com](mailto:seaton@spilmanlaw.com)

Carrie M. Harris, Esq.  
Spilman Thomas & Battle, PLLC  
110 Oakwood Drive, Suite 500  
Winston-Salem, NC 27103  
[charris@spilmanlaw.com](mailto:charris@spilmanlaw.com)

Derrick Price Williamson, Esq.  
Spilman Thomas & Battle, PLLC  
1100 Bent Creek Blvd., Suite 101  
Mechanicsburg, PA 17050  
[dwilliamson@spilmanlaw.com](mailto:dwilliamson@spilmanlaw.com)

John T. Burnett  
Duke Energy Business Services, LLC  
550 South Tryon Street  
Charlotte, NC 28202  
[John.burnett@duke-energy.com](mailto:John.burnett@duke-energy.com)

Rebecca J. Dulin, Esq.  
Duke Energy Carolinas, LLC  
1201 Main Street, Suite 1180  
Capital Center Building  
Columbia, SC 29201  
[Rebecca.dulin@duke-energy.com](mailto:Rebecca.dulin@duke-energy.com)

Molly McIntosh Jagannathan  
Troutman Sanders LLP  
301 South College Street, Suite 3400  
Charlotte, NC 28202  
[Molly.Jagannathan@troutman.com](mailto:Molly.Jagannathan@troutman.com)



Bess J. DuRant (SC Bar #77920)